

claim 1 is not based on the number of path intersections that occur within a cell but rather the number of outlines of pieces of artwork that map to the cell.

An example using figures in the instant application will illustrate the difference. Figure 18 of the application shows several outlines being mapped onto a grid. One of the outlines, the one of artwork 138 is completely inside one of the grids cells. Figure 19 shows the complexity value of each of the grid cells. Cell 146 has a complexity value of "4" since four outlines map to the cell. These are the outlines of pieces of artwork 136, 138, 140 and 142. It is important to note that none of the outlines in cell 146 actually intersect; the complexity value is due merely to their presence in the cell. In contrast, the cited passage of Schiller describes a method that would assign a complexity value of "0" to the 146 cell because the cell contains no path intersections.

Arguments along these lines were made in the applicant's first response filed December 11, 2001. In response, the Examiner points to column 1, lines 46-48 of Schiller, which describe that "if more than two objects (paths) are present, the graphical processing system must be able to determine which parts of which paths overlap." This passage describes a requirement of a graphical processing system and has nothing to do with determining complexity value of a cell.

The Examiner also points to lines 6-13 of column 7, which describes a memory reallocation process. The applicant submits that this passage also has nothing to do with determining complexity value of a cell. Thus, the applicant respectfully submits these passages of Schiller and the one cited above do not disclose or suggests the quoted element of claim 1.

The Examiner also asserts that lines 43-47 of column 6 of Schiller describe assigning complexity value based on the number of path intersections with, as oppose to within (which is what is specified in the passage), a boundary of a tile and, consequently, disclose the quoted element of claim 1. The applicant must respectfully disagree for several reasons. First, "the number of path intersections occurring *within* its boundary," as specified in the passage, does not mean the number of path intersections *with* its boundary. Col. 6, lines 43-47 (emphasis added). If the author of Schiller meant the latter, the author would have used the word "with" instead of the word "within." Furthermore, even if the cited passage could be construed to mean path intersections with a boundary, the cited passage does not disclose or suggest the quoted element of claim 1. Another example will illustrate. Take, for example, a grid with a circle that is inside

of, but which does not intersect with, the grid's boundary. The Schiller method, as construed by the Examiner, would assign a complexity value of "0" because there is no intersection between the path of the circle and the boundary of the tile. In contrast, the method of claim 1 would assign a complexity value of "1." Thus, the applicant respectfully submits that this cited passage of Schiller fails to disclose or suggest the quoted element of claim 1.

The Examiner suggests that another passage of Schiller, i.e., lines 51-54 of column 6, discloses the quoted element of claim 1. Lines 51-54 of column 6 read: "As each path (or pair of paths as described above) is processed at step 715, the complexity value of all those tiles intersected by the path are updated (step 720)." The applicant respectfully points out that this passage describes when the complexity value of a given tile is calculated and not the manner in which the complexity value is calculated. Thus, the applicant submits that this passage, like the ones cited above, also does not disclose or suggest the quoted element of claim 1. Accordingly, the applicant respectfully submits that claim 1 and claims 2-14, which depend from claim 1, are in condition for allowance.

Claim 15 stands similarly rejected. Claim 15 recites: "[I]dentify the cell as a complex region based on the determined number of outlines that map to the cell." For at least the reasons discussed above, Schiller fails to disclose or suggest the quoted element of claim 15.

Accordingly, the applicant respectfully submits that claim 15 and its dependent claim 16 are in condition for allowance.

Applicant : Lubomir D. Bourd..., et al.
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The applicant asks that all claims be allowed. The applicant believes that no fees are due.
Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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Tim H. Pham
Tim H. Pham
Reg. No. 48,589

Fish & Richardson P.C.
500 Arguello Street, Suite 500
Redwood City, California 94063
Telephone: (650) 839-5070
Facsimile: (650) 839-5071

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